


IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

DEBRA WELLMAN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:05-280 SLR
)	
THE DOW CHEMICAL COMPANY,)	
)	
Defendant.)	

MOTION TO DISMISS

Defendant, The Dow Chemical Company, hereby moves this Court to dismiss Plaintiff's Complaint in the above matter. In support of this Motion, Defendant respectfully represents that Plaintiff, Debra Wellman, was never employed by The Dow Chemical Company, nor was she supervised by employees of The Dow Chemical Company. In addition, the employees she alleges engaged in sexual harassment were employees of DuPont Dow Elastomers, LLC, at all times when Plaintiff alleges that such conduct occurred.

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Dated: March 14, 2006

CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2006, I electronically filed a true and correct copy of the foregoing Motion to Dismiss with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record. A courtesy copy of such Motion to Dismiss was also hand delivered to the following counsel of record on this date.

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Dated: March 15, 2006